

FILED

OCT 21 2010

U. S. DISTRICT COURT
E. DISTRICT OF MO.

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)

Plaintiff,)

v.)

ROBERT EDWARD COLLINS,)

JOSEPH MICHAEL MCGEE,)

RANDY J. SPENCE, JR.,)

TONY A. ADCOX, and)

JAMIE L. HATFIELD,)

NATASHA LYNN SPENCE,)

BILLY WAYNE ADCOX,)

DIANE R. GENTILE, and)

ROBERT BROACH, JR.)

Defendants.)

No. **4:10CR 00536 HEA**

COUNTS I, II
COUNTS I, III
COUNTS I, IV
COUNTS I, V
COUNTS I, VI
COUNTS I, VII
COUNTS I, VIII
COUNTS I, IX
COUNTS I, X

INDICTMENT

**COUNT I: CONSPIRACY TO POSSESS PSEUDOEPHEDRINE WITH THE INTENT TO
MANUFACTURE METHAMPHETAMINE**

The Grand Jury charges that:

Beginning at a time unknown to the Grand Jury, but including March 2007 through the date of this indictment, with the exact dates unknown to this Grand Jury, in St. Louis County and elsewhere within the Eastern District of Missouri, and elsewhere, the defendants,

**ROBERT EDWARD COLLINS,
JOSEPH MICHAEL MCGEE,
RANDY J. SPENCE JR.,
JAMIE L. HATFIELD,
TONY A. ADCOX,
NATASHA LYNN SPENCE,
BILLY WAYNE ADCOX,
DIANE R. GENTILE, and
ROBERT BROACH, JR.,**

did knowingly and willfully conspire, combine, confederate and agree with each other and other persons both known and unknown to this Grand Jury, to commit offenses against the United States, to wit: to knowingly possess pseudoephedrine, a listed chemical, with the intent to manufacture methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(c)(1).

All in violation of Title 21, United States Code, Section 846 and punishable under Title 21, United States Code, Section 841(c).

MANNER AND MEANS OF CONSPIRACY

The defendants accomplished and attempted to accomplish the objects of the conspiracy in the following manner and through the following means:

1. It was part of the conspiracy that Robert Collins purchased more than 369 grams of pseudoephedrine between May 8, 2007 and March 22, 2010.
2. It was part of the conspiracy that Joseph McGee purchased more than 635 grams of pseudoephedrine between November 4, 2008 and September 22, 2010.
3. It was further part of the conspiracy that Randy Spence purchased more than 200 grams of pseudoephedrine between March 19, 2007 and March 22, 2010.
4. It was further part of the conspiracy that Jamie Hatfield purchased more than 168 grams of pseudoephedrine between October 2, 2007 and March 22, 2010.
5. It was further part of the conspiracy that Natasha Spence purchased more than 75 grams of pseudoephedrine between October 9, 2007 and May 10, 2010.

6. It was further part of the conspiracy that Billy Adcox purchased more than 143 grams of pseudoephedrine between January 8, 2008 and May 28, 2010 and possessed over 21 grams of pseudoephedrine on July 3, 2010.
7. It was further part of the conspiracy that Diane Gentile purchased more than 142 grams of pseudoephedrine between January 8, 2008 and June 10, 2010.
8. It was further part of the conspiracy that Robert Broach purchased more than 164 grams of pseudoephedrine between April 23, 2009 and February 13, 2010.

COUNT II: POSSESSION OF PSEUDOEPHEDRINE WITH THE INTENT TO MANUFACTURE METHAMPHETAMINE (ROBERT COLLINS)

The Grand Jury further charges that:

Between May 8, 2007 and March 22, 2010, in St. Louis County and elsewhere within the Eastern District of Missouri, the defendant,

ROBERT EDWARD COLLINS,

knowingly and willfully possessed pseudoephedrine, a List I chemical, with the intent to manufacture methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(c)(1), and punishable under Title 21, United States Code, Section 841(c).

COUNT III: POSSESSION OF PSEUDOEPHEDRINE WITH THE INTENT TO MANUFACTURE METHAMPHETAMINE (JOSEPH MCGEE)

The Grand Jury further charges that:

Between November 4, 2008 and September 22, 2010, in St. Louis County and elsewhere within the Eastern District of Missouri, the defendant,

JOSEPH MICHAEL MCGEE,

knowingly and willfully possessed pseudoephedrine, a List I chemical, with the intent to manufacture methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(c)(1), and punishable under Title 21, United States Code, Section 841(c).

COUNT IV: POSSESSION OF PSEUDOEPHEDRINE WITH THE INTENT TO MANUFACTURE METHAMPHETAMINE (RANDY SPENCE)

The Grand Jury further charges that:

Between March 19, 2007 and March 22, 2010, in St. Louis County and elsewhere within the Eastern District of Missouri, the defendant,

RANDY J. SPENCE JR.,

knowingly and willfully possessed pseudoephedrine, a List I chemical, with the intent to manufacture methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(c)(1), and punishable under Title 21, United States Code, Section 841 (c).

COUNT V: POSSESSION OF PSEUDOEPHEDRINE KNOWING IT WOULD BE USED TO MANUFACTURE METHAMPHETAMINE(JAMIE HATFIELD)

The Grand Jury further charges that:

Between October 2, 2007 and March 22, 2010, in St. Louis County and elsewhere within the Eastern District of Missouri, the defendant,

JAMIE L. HATFIELD,

possessed pseudoephedrine, a List I chemical, knowing and having a reasonable cause to believe, that the listed chemical would be used to manufacture a controlled substance, to wit: methamphetamine, in violation of Title 21, United States Code, Section 841(c)(2), and punishable under Title 21, United States Code, Section 841(c).

COUNT VI: POSSESSION OF PSEUDOEPHEDRINE KNOWING IT WOULD BE USED TO MANUFACTURE METHAMPHETAMINE (NATASHA SPENCE)

The Grand Jury further charges that:

Between October 9, 2007 and May 10, 2010, in St. Louis County and elsewhere within the Eastern District of Missouri, and elsewhere, the defendant,

NATASHA LYNN SPENCE,

possessed pseudoephedrine, a List I chemical, knowing and having a reasonable cause to believe, that the listed chemical would be used to manufacture a controlled substance, to wit: methamphetamine, in violation of Title 21, United States Code, Section 841(c)(2), and punishable under Title 21, United States Code, Section 841(c).

COUNT VII: POSSESSION OF EQUIPMENT USED TO MANUFACTURE METHAMPHETAMINE (TONY ADCOX)

The Grand Jury further charges that:

Beginning at a time unknown to the Grand Jury, but including November 2007, through the date of this indictment, with the exact dates unknown to this Grand Jury, in Franklin County and elsewhere within the Eastern District of Missouri, and elsewhere, the defendant,

TONY A. ADCOX,

knowingly and willfully possessed pseudoephedrine, a List I chemical, and equipment, to wit: ammonium nitrate, plastic tubing, red crown lye and Coleman fuel, knowing and having a reasonable cause to believe, that the listed chemical would be used to manufacture a controlled substance, to wit: methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 843(a)(6), and punishable under Title 18, United States Code 2, and punishable under Title 21, United States Code, Section 843(d).

**COUNT VIII: POSSESSION OF PSEUDOEPHEDRINE KNOWING IT WOULD
BE USED TO MANUFACTURE METHAMPHETAMINE
(BILLY ADCOX)**

The Grand Jury further charges that:

Between January 8, 2008 and July 3, 2010, in St. Louis County and elsewhere within the Eastern District of Missouri, the defendant,

BILLY WAYNE ADCOX,

possessed pseudoephedrine, a List I chemical, knowing and having a reasonable cause to believe, that the listed chemical would be used to manufacture a controlled substance, to wit: methamphetamine, in violation of Title 21, United States Code, Section 841(c)(2), and punishable under Title 21, United States Code, Section 841(c).

**COUNT IX: POSSESSION OF PSEUDOEPHEDRINE KNOWING IT WOULD BE
USED TO MANUFACTURE METHAMPHETAMINE(DIANE GENTILE)**

The Grand Jury further charges that:

Between January 8, 2008 and June 20, 2010, in St. Louis County and elsewhere within the Eastern District of Missouri, the defendant,

DIANE R. GENTILE,

possessed pseudoephedrine, a List I chemical, knowing and having a reasonable cause to believe, that the listed chemical would be used to manufacture a controlled substance, to wit: methamphetamine, in violation of Title 21, United States Code, Section 841(c)(2), and punishable under Title 21, United States Code, Section 841(c).

COUNT X: POSSESSION OF PSEUDOEPHEDRINE KNOWING IT WOULD BE USED TO MANUFACTURE METHAMPHETAMINE (ROBERT BROACH)

The Grand Jury further charges that:

Between April 23, 2009 and February 13, 2010, in St. Louis County and elsewhere within the Eastern District of Missouri, the defendant,

ROBERT BROACH,

possessed pseudoephedrine, a List I chemical, knowing and having a reasonable cause to believe, that the listed chemical would be used to manufacture a controlled substance, to wit: methamphetamine, in violation of Title 21, United States Code, Section 841(c)(2), and punishable under Title 21, United States Code, Section 841(c).

A TRUE BILL.

FOREPERSON

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